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April 3, 2023

BY ECF

Chief Magistrate Judge Cheryl L. Pollak
Chambers Room 1230
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Ahamed v. 563 Manhattan Inc., et al.
1:19-cv-06388-EK-CLP Defendants' Request
To Submit a Sur-Reply re: New Issues Raised

Dear Chief Magistrate Judge Pollak:

I represent all Defendants in this matter and respectfully request Defendants' the opportunity to file the attached Sur-Reply to Plaintiff's Motion for Sanctions (ECF 114).

In Plaintiff's Declaration in support, for the first time he provides Defendants with much-belated discovery and may have perjured himself by now claiming a video was served in 2020.

Defendants respectfully request the opportunity to file their Sur-Reply, attached hereto as Exhibit "A."

Respectfully Submitted,

Michael L. Ferch
Michael L. Ferch, Esq.
Counsel for Defendants

cc: Zachary J. Liska, Esq. (via ECF)